

From: [Herman, Chris](#)
To: [Sanders, Stacy \(HHS/IOS\)](#)
Subject: Follow-up to 7/19 meeting
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Attachments: [image001.png](#)

Good afternoon, Stacy. Thank you for meeting with nursing home resident and workforce advocates yesterday morning. I am writing to underscore NASW's positions on the critical issues we discussed by providing links to our comments on the 2022 nursing staffing RFI and the 2023 ownership-transparency NPRM:

- Staffing: <https://bit.ly/NASW-CMS-staff-RFI-June2022>
- Ownership: https://bit.ly/NASW_nursing-home-ownership_comments_2023

My NASW colleagues and I urge HHS to release a minimum staffing standard for CNAs, LPNs-LVNs, and RNs that

- matches or exceeds the recommended standards of the 2001 Abt Associates study,
- excludes waivers, and
- includes meaningful enforcement.

Anything less would, as the 2001 study noted, put nursing home residents at risk for "immediate harm and jeopardy" and exacerbate the recruitment and retention crisis already rampant throughout the nursing home industry.

Thank you for considering NASW's perspective.

Best regards,

Chris

Chris Herman, MSW, LICSW (*she, her*) [[What do these pronouns mean, and why do they matter?](#)]

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